

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
DANIEL LEE FEASER	:	
DANA MARIE FEASER	:	CASE NO. 1:13-bk-01352
Debtors	:	
	:	
DITECH FINANCIAL LLC,	:	
Movant	:	
	:	
v.	:	
	:	
DANIEL LEE FEASER	:	
DANA MARIE FEASER,	:	
Respondents	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Proof that foreclosure proceedings were initiated or contemplated at the time of the filing of the bankruptcy petition is demanded at trial and this paragraph is therefore denied. The Debtors were only in arrears by three payments when the bankruptcy was filed.
6. Proof of default is demanded at trial and this paragraph is therefore denied.
7. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.
8. Admitted that Movant has filed documentation in support of a motion for relief. Denied that Movant is entitled to relief.
9. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtors are responsible for payment of attorney fees and costs are therefore denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire
Mott & Gendron Law
Attorney ID # 43568
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
doriemott@aol.com